

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF RESOURCES

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| TO: | COUNCIL | |
| DATE: | 28 JANUARY 2020 | |
| TITLE: | APPROVAL OF THE LOCAL COUNCIL TAX SUPPORT SCHEME AND THE COUNCIL TAX BASE FOR 2020/21 | |
| LEAD COUNCILLOR: | COUNCILLOR EMBERSON | PORTFOLIO: CORPORATE & CONSUMER SERVICES |
| SERVICE: | FINANCE | WARDS: BOROUGHWIDE |
| LEAD OFFICER: | MATT DAVIS | TEL: 01189 372 954 |
| JOB TITLE: | ASSISTANT DIRECTOR OF FINANCE | E-MAIL: matthew.davis@reading.gov.uk |

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Section 33 of the Local Government Finance Act 1992 and the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012 requires the Council as the Billing Authority to calculate a Council Tax Base for its area after 30th November and before 31st January in the preceding financial year for the forthcoming year and, to duly notify precepting authorities (Fire and Police) within the same timescales.
- 1.2 The Tax Base for 2020/21 is calculated for the above purposes as being 56,741 (Band D equivalent) properties - an increase of 1.5% on the 2019/20 Tax Base of 55,884 properties. This growth during the year is expected to generate a surplus of £277k in 2019/20 of which the Council's share is £237k
- 1.3 The Welfare Reform Act 2012 and Local Government Finance Act 2012 replaced the Council Tax Benefit scheme with a locally determined Council Tax Reduction Scheme (also known as a local Council Tax Support Scheme), which is effectively a type of Council Tax discount. These Acts require the Council to approve a Scheme by the end of January preceding the start of the financial year. The recommended Scheme for 2020/21 is based on the Scheme agreed by Council for 2019/20 amended for the changes proposed at Policy Committee in November 2019 and subsequently consulted on. The proposed changes benefit local residents by:
 - a) Removing the requirement to re-apply for Council Tax Support following migration from Housing Benefit to Universal Credit;
 - b) Disregarding Severe Disability Transitional payments in the calculation of assessed income thresholds; and
 - c) Providing greater clarity on the treatment of excess Council Tax Support.
- 1.4 The Ministry of Housing Communities and Local Government (MHCLG) have completed an annual update of various allowances particularly as the scheme

affects pensioners and those changes have also been incorporated. When we consulted on the original principles of the new local scheme in the summer/autumn of 2012, we indicated that various allowances would be subject to annual uprating, so there would be no need for further public consultation on the principle of those changes each year.

2. RECOMMENDED ACTION:

- 2.1 That the proposed changes to the Local Council Tax Reduction Scheme, taking into account the results of the public consultation as set out in Appendix A and summarised in para 4.6 below, be approved;**
- 2.2 That the 2019/20 Council Tax Reduction Scheme allowances would be updated in line with regulations be noted;**
- 2.3 That the proposed additional support offered to the Council's Care Leavers as a local discount and incorporated in the Council's draft 2020/21 Budget proposals and Medium Term Financial Strategy be noted;**
- 2.4 That the changes to the Empty Property Premia in 2020/21 for properties that have been empty in excess of five years from 100% to 200% - as agreed by Council in January 2019 be noted;**
- 2.5 That the Tax Base calculation for 2020/21 as 56,741 Band D equivalent properties be approved; and**
- 2.6 That the estimated surplus on the Council Tax Collection Fund in 2019/20 of £277k be approved, of which the Council's share would be £237k.**

Appendix A - Results of Consultation on Proposed Local Council Tax Reduction Scheme Changes for 2020/21.

Appendix B - Equalities Impact Assessment on Proposed Amendments to Council Tax Reduction Scheme.

3. POLICY CONTEXT

- 3.1 Under Government regulations it is necessary for the Council to review its Collection Fund and decide the following:**
 - Its Council Tax Collection Rate for 2020/21;
 - Its Council Tax Reduction Scheme for 2020/21;
 - The Council Tax Base to be used for setting its 2020/21 Council Tax; and
 - The estimated Council Tax surplus or deficit for 2019/20.

4. COUNCIL TAX REDUCTION SCHEME

- 4.1. The Local Government Finance Act 2012 replaced the Council Tax Benefit scheme with a new locally determined Council Tax Reduction Scheme (also known as a local Council Tax Support scheme) from April 2013. This is effectively now a Council Tax discount.**

- 4.2. Each local authority is required to annually set a local Council Tax Reduction Scheme for working age claimants. The government continues to operate a statutory national scheme for pensioners, which provides them with broadly the same level of Council Tax Support as they received under the previous Council Tax Benefit scheme, but has been adjusted by the Government since its introduction to incorporate a number of welfare reform initiatives.
- 4.3. The local Council Tax Reduction Scheme was initially funded through a specific central government grant set at 90% of each local authority's Council Tax Benefit expenditure. Government funding since 2014/15 has been rolled into the Council's overall Revenue Support Grant settlement.
- 4.4. In November 2019, Policy Committee approved a proposal to consult on a number of improvements to its Local Council Tax Support Scheme to streamline administration and improve the service for customers. These changes were as follows:
 - a) Remove the requirement to re-apply for Council Tax Support following the migration from Housing Benefit to Universal Credit (UC) - claimants would not automatically need to re-apply when transitioning to UC, removing a burden on the claimant and ensuring all entitled to support continue to receive it. This change will prevent some residents getting in to debt and reduce staff time in needlessly processing new claims;
 - b) Disregard Severe Disability Transitional payments in the calculation of benefit entitlement - allowing residents to fully benefit from Severe Disability payments which would otherwise be potentially offset by the assessed income level thresholds; and
 - c) Provide greater clarity on the treatment of excess Council Tax Support - following the Local Government Ombudsman's request to all Councils to regularise the treatment of "official error reductions" for Council Tax Support.
- 4.5. The statutory public consultation on the proposed changes to the local scheme was run on-line and took place from 19th November 2019 to 31st December 2019.
- 4.6. Appendix A to this report sets out a summary of the responses received to the consultation as well as officer comments and advice. The consultation was published on the Council's website, between 19 November 2019 to the 31 December 2019. Approximately 39,000 direct emails were also sent to Council Tax Payers (where we hold an email address) which included the link to the consultation. 1,594 responses were received (4.09% of those emailed), with over 80% in favour of the proposals.
- 4.7. The Equality Impact Assessment in respect of the proposed changes to the Council Tax Support Scheme is included in Appendix B
- 4.8. In 2018/19 the Council's Scheme was updated as follows:
 - Minimum contribution to Council Tax is 35%
 - Capital limit is £3,000;
 - Non-dependant deductions (based on income) is £10.00 per week for those not engaged in remunerative work (working less than 16 hours per week) and/or have gross earnings less than £196.95 per week;

- Non-dependant deductions for those engaged in remunerative work (16 hours or more) with gross weekly earnings of £196.95 per week and above is £15.00 per week.

- 4.9. These changes have been in place for the last two years and have not caused significant impacts to the working age customers it affects. Equally; there has not been a significant impact on the in-year collection rate which has dropped by just 0.19% from 96.6% to 96.41%.
- 4.10. Pension age customers continue to be protected by the default scheme of 100% support based on a financial means test.
- 4.11. The Council's minimum charge for those in receipt of a Council Tax Reduction is at the higher end of charges implemented by other authorities. An increase above the general increase would have a negative impact on vulnerable people in receipt of these benefits who are also impacted by other welfare reforms. It will also impact on the collection of Council Tax from these people.
- 4.12. It is therefore recommended that the Council retains the Council Tax Reduction Scheme in 2020/21 as applied in 2019/20, amended to include the 3 changes detailed in 4.4 above.

5. LOCAL DISCOUNTS

- 5.1. The Council has recognised its responsibility as a "corporate parent" with regard to children leaving its care - care leavers. Budget proposals set out in the draft 2020/21 Budget and Medium Term Financial Strategy (MTFS) considered by Policy Committee in December 2019, include proposals to provide financial support towards meeting the cost of the Council Tax bills for care leavers between the ages of 18 and 21. The proposed support is tapered such that 18-year olds will receive a 100% contribution to their net bill (after applying all other exemptions and discounts), and would reduce to 66% for 19-year olds and 33% for 20-year olds.
- 5.2. Eligibility would only apply to Reading's own care leavers and not care leavers from other boroughs who may now reside in Reading. The cost of this budget proposal has been forecast at £50k and is met entirely from the Council's own resources and does not therefore impact on the Tax Base for either of the other two precepting authorities.
- 5.3. A separate budget, also of £50k, has been proposed in the draft MTFS to provide equivalent support for Reading's own care leavers who now reside out of borough and are thus are not eligible for the Council's own discount. This will be administered by Brighter Futures for Children on behalf of the Council.

6. CALCULATION OF TAX BASE

- 6.1. The Council Tax Base is used in the Council's own 2020/21 budget setting and by precepting authorities (the Police and Fire authorities) to determine how much Council Tax income is anticipated to be received.
- 6.2. The Tax Base relates to the estimated number of Band D equivalent properties in Reading. This is calculated by taking the number of registered properties in Reading which is then reduced for property or resident discounts and then converted to a

Band D equivalent number of properties. Band D is used for comparison purposes with other Local Authorities and is assumed to be the average council tax banding. The majority of Reading's dwellings sit within Bands B and Band C. Regulations require the calculation to be based on the number of registered properties at 30th November 2019 and are set out in Table 1 below, together with the Band D equivalent numbers of properties.

Table 1 - Number of properties in each Council Tax Band

| Band | 2019/20 Taxbase (Before Discounts & CTRS) | | | | 2020/21 Taxbase (Before Discounts & CTRS) | | | |
|---------------|---|---------------------------|-------------------------|---|---|---------------------------|-------------------------|---|
| | Number of Properties in Each Band (No.) | Band D Proportion Payable | Band D Equivalent (No.) | Proportion of Band D Equivalents (%age) | Number of Properties in Each Band (No.) | Band D Proportion Payable | Band D Equivalent (No.) | Proportion of Band D Equivalents (%age) |
| A | 6,907 | 6/9 | 4,605 | 6.8% | 7,151 | 6/9 | 4,767 | 7.0% |
| B | 14,233 | 7/9 | 11,070 | 16.5% | 14,404 | 7/9 | 11,203 | 16.4% |
| C | 29,123 | 8/9 | 25,887 | 38.5% | 29,581 | 8/9 | 26,294 | 38.4% |
| D | 10,976 | 9/9 | 10,976 | 16.3% | 11,215 | 9/9 | 11,215 | 16.4% |
| E | 5,535 | 11/9 | 6,765 | 10.1% | 5,679 | 11/9 | 6,941 | 10.1% |
| F | 3,287 | 13/9 | 4,748 | 7.1% | 3,293 | 13/9 | 4,757 | 6.9% |
| G | 1,844 | 15/9 | 3,073 | 4.6% | 1,856 | 15/9 | 3,093 | 4.5% |
| H | 83 | 18/9 | 166 | 0.2% | 85 | 18/9 | 170 | 0.2% |
| Total | 71,988 | | 67,290 | 100.0% | 73,264 | | 68,441 | 100.0% |
| <i>Change</i> | | | | | 1.8% | | 1.7% | |

- 6.3. The current number of Band D equivalent properties is then adjusted for exemptions, discounts and premia and then further adjusted for anticipated growth between 1st December 2019 and 31st March 2021 as well as the expected collection rate.
- 6.4. Council agreed to increase the premium on long term (over two years) empty properties from 50% to 100% in January 2019 for the year commencing 2019/20. This increase became available under changes made by the Rating (Properties in Common Occupation) and Council Tax (Empty Dwellings) Act 2018, which allowed the maximum premium for empty properties to rise from a 50% premium to 100% from 2019/20. The Act also allowed for further increases in premia to be phased in over the years 2020/21 and 2021/22. In 2020/21, the ability to apply a 200% premium for properties that have been empty for over five years, whilst in 2021/22 it becomes possible to charge a 300% premium on properties empty for ten years or more.
- 6.5. Council agreed in January 2019 to apply these future increases as they became enabled. Table 2 below summarises the changes in empty property premium allowed for under the Act, and agreed by Council in January 2019:

Table 2 - Long Term Empty Property Premia

| Financial Year | Empty Properties (2 Years or More) (%age) | Empty Properties (5 Years or More) (%age) | Empty Properties (10 Years or More) (%age) |
|----------------|---|---|--|
| 2018/19 | 50% | n/a | n/a |
| 2019/20 | 100% | n/a | n/a |
| 2020/21 | 100% | 200% | n/a |
| 2021/22 | 100% | 200% | 300% |

- 6.6. Whilst the financial benefit to the Council of introducing the further empty property premium changes are modest it is anticipated that the additional charges will incentivise owners to some extent to increase the number of properties available for local residents and in so doing reduce the negative impact on neighbourhoods that may be associated with properties remaining empty.
- 6.7. The estimated increase in the Tax Base is based on past trends, properties that haven't yet appeared on the valuation list, and planning estimates of housing growth. For 2020/21 we have assumed 1.0% average growth throughout the year (assumed 2.0% by the end of the period but recognising not all of that growth will have occurred before the start of the next financial year). This is in line with the growth experienced in the years 2016/17; 2018/19; and 2019/20 (but excludes the unusually high growth experienced in 2017/18).
- 6.8. The overall collection rate remains unchanged from that assumed in the 2019/20 Tax Base calculation (99%). The in-year collection rate is targeted to improve from the current 96.41 in the current year to 97.0% next year as part of the Revenues and Benefits Service Improvement Plan.
- 6.9. Including the increase in long term empty property premia, previously agreed by Council in January 2019, the Council Tax Base for 2020/21 is estimated to be increase from 55,884 Band D equivalent properties to 56,741 (a 1.5% increase) as shown in the Table 3 below:

Table 3 - Calculation of Council Tax Base (Including Increase in Long Term Empty Premium)

| | 2019/20 Taxbase | | 2020/21 Taxbase | |
|---|-----------------|---------------|-----------------|---------------|
| | (No.) | (No.) | (No.) | (No.) |
| Total Number of dwellings on the Valuation List at 30th November 2019 | | 71,988 | | 73,264 |
| Reductions for Discounts and Exemptions - e.g. Single Person Discount, Students, Empty Property etc | (8,966) | | (8,930) | |
| Less Discounts in relation to the Council Tax Reduction Scheme | (4,861) | (13,827) | (4,652) | (13,582) |
| Net Number of dwellings on the Valuation List at 30th November 2019 | | <u>58,161</u> | | <u>59,682</u> |
| Number of Band D Equivalent Properties | | 55,349 | | 56,617 |
| Long-Term Empty Property Premium (100%) | | 102 | | 111 |
| New 5-Year Empty Property Premium (200%) | | n/a | | 20 |
| Allowance for Assumed Growth (1.0%) | | 997 | | 566 |
| | | <u>56,448</u> | | <u>57,314</u> |
| Allowance for Non-Collection (1.0%) | | (564) | | (573) |
| Council Tax Base 2020/21 | | <u>55,884</u> | | <u>56,741</u> |
| Change | | | | 1.5% |

- 6.10. The increase in the Tax Base represents the continued success of the Council in supporting the local economy and delivering additional housing to meet resident need - with 1,276 additional properties registered on the Tax List between November 2018 and November 2019. The forecast growth in the proposed Tax Base of 1.5%

would, at the Council's existing Band D average Council Tax (£1,627.23), represent £1.4m of additional resources available to fund future services.

7. COLLECTION FUND SURPLUS

- 7.1. Any difference between the estimated Tax Base and that actually realised in year has no impact on the in-year General Fund revenue position, but is transferred to the Collection Fund Adjustment Account unusable reserve and distributed in the following year.
- 7.2. Based on current trends in Tax Base growth and collection levels, a forecast surplus over and above that originally calculated is expected by the end of 2019/20 and will be released in 2020/21 as a one-off credit. The surplus is distributed in proportion to the relevant share of Band D tax amounts between the relevant major preceptors within the area (the Council, Police and Fire Authorities). Table 4 below illustrates the determination and distribution of the forecast surplus:

Table 4 - 2019/20 Forecast Collection Fund Surplus

| | 2019/20 Band D Charge (£'s) | Proportion of Total Band D (%age) | Share of Estimated Surplus (£,000's) |
|-------------------------------|--------------------------------------|--|---|
| Reading Borough Council | 1,627.23 | 85.7% | 237 |
| Thames Valley Police | 206.28 | 10.9% | 30 |
| Royal Berkshire Fire & Rescue | 66.28 | 3.5% | 10 |
| | 1,899.79 | 100.0% | 277 |

- 7.3. The above projected surplus is based on data as at the end of November 2019 and has potential to vary by year end.
- 7.4. The £237k forecast surplus for Reading Council represents a 0.3% variance on the originally calculated yield for the Council of £90.94m.

8. RISK

- 8.1. There are several key variables in setting the Council Tax Base which have the potential to change. There are set out below.
- 8.2. Eligibility for discounts and exemptions is factored in to the calculated Tax Base. These include student discounts, single person discount and the Council Tax Reduction Scheme - the latter being particularly prone to change dependent upon employment status of working age benefit claimants. Should local employment levels change as the result of structural change to future local or national economic circumstances, the Tax Base will change.
- 8.3. The Tax Base includes forecast growth in the number of properties subject to a Council Tax liability. Whilst this is based on historic growth levels achieved and known planned development, it remains an estimate and is sensitive to changes in the economy and house building market.

- 8.4. Collection rates are assumed to be 97.0% for 2020/21 (an increase of 0.6% on that being achieved in the current year) and remain at 99.0% ultimately collected. Any significant variation regarding in-year collection rates has the potential to impact on the level of bad debt provision required and would impact on overall collection levels and any projected surplus or deficit.
- 8.5. In setting the Council Tax Base for 2020/21, statutory regulations prevent the net amount credited to the Council's General Fund from being different in 2020/21 to that originally estimated (and applies to precepting bodies in the same way). Any variance would however impact in either 2021/22 or 2022/23 depending on when any variance is identified.

9. CONTRIBUTION TO STRATEGIC AIMS

- 9.1. To secure the most effective use of the Council's resources in the delivery of high quality, best value public services.

10. COMMUNITY ENGAGEMENT AND INFORMATION

- 10.1. A consultation exercise was carried out on the proposed amendments to the local Council Tax Support Scheme for the 2020/21 financial year.
- 10.2. The statutory consultation took place between the 19th November and 31st December 2019. A total of circa 39,000 customers were contacted directly by email to ask them for their views. In addition, the consultation questionnaire was published on the Council's website
- 10.3. Although Government's code of practice on consultation states that normally 12 weeks is appropriate, billing authorities may wish to consider the appropriate length of their consultation depending on the impact of their proposals and the ability to complete the consultation exercise within budgetary timetables.
- 10.4. The code of practice indicates that where timing is restricted, for example, due to having to meet a fixed timetable such as a budget cycle, there may be good reason for a shorter consultation, and any documentation should be clear for the reasons for the shorter period.
- 10.5. We have carried out the statutory consultation with results detailed at Appendix A and this report forms part of the consultation process.

11. EQUALITY IMPACT ASSESSMENT

- 11.1. A full equality impact assessment on the proposed changes is set out at Appendix B.
- 11.2. All of the proposed amendments impact positively on all customers of working age currently in receipt of Council Tax Support.
- 11.3. Pensioners remain unaffected by these proposals.

12. LEGAL IMPLICATIONS

- 12.1. The Council as Billing Authority is required to determine the Council Tax Base for the next financial year by 31st January 2020 and to notify other precepting authorities of the determination.

13. FINANCIAL IMPLICATIONS

- 13.1. The increase in the Council Tax Base of 857 average Band D properties equates to an increase in Council Tax income of £1,395k based on the 2019/20 Council Tax charge of £1,627.23 for a Band D property.
- 13.2. The Tax Base as calculated based on system data as at 30th November exactly matches that used in the draft budget considered by Policy Committee and issued for consultation in December 2019.
- 13.3. The draft budget made no assumption as to any surplus in the Collection Fund for 2019/20. The £237k projected surplus set out in Section 7 represents additional resources in 2020/21 should they be realised.

14. ENVIRONMENTAL IMPLICATIONS

- 14.1. None to advise.

15. BACKGROUND PAPERS

- 15.1. The Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.

Appendix A

Consultation Response Summary - Proposed Changes to Local Council Tax Reduction Scheme

The consultation was published on the Council's website, between the 19 November 2019 to the 31 December 2019.

In addition, approximately 39,000 direct emails were sent to Council Tax Payers (where we hold an e-address) which included the link to the consultation.

1,594 responses were received,
1,542 indicated they were residents (96.74%)
31 indicated they were businesses (1.94%)
11 indicated they were voluntary sector (0.69%)
11 indicated they worked for a charity (0.69%)
56 indicated they were landlords (3.51%)
35 said they were "others" or Not Answered (2.19%)
244 responders were currently in receipt of Council Tax Support (15.31% of respondents)

There were 3 proposals for change overall and in summary the responses were as follows:

- (i) 87.58% of respondents agreed with the proposal to remove the requirement to re-apply for Council Tax Support following the migration to Universal Credit. Those opposing generally did not have a full understanding of the administration process of Council Tax Support and Universal Credit based on the comments made. Whilst reviewing the comments, it was clear they were actually in favour of this change.
- (ii) 86.14% agreed with the proposal to Disregard Severe Disability Transitional payments in the calculation of benefit entitlement. Those opposing generally felt that all income should be considered in the calculation.
- (iii) 80.61% agreed the proposal to Provide greater clarity on the treatment of excess Council Tax Support. Those opposing had concerns for vulnerable customers managing repayments on limited budgets.

Officer Comment & Advice

It is recommended that that we go forward with the proposed changes detailed above.

Officers advise these proposals are necessary to reduce the administrative burden on both customers and the Council, provide clarity of process and ensure we continue to protect those most vulnerable.



Provide basic details

Name of proposal/activity/policy to be assessed

1. Council Tax Support Scheme 2020/21: Removal of requirement to reclaim Council Tax Support following migration to Universal Credit, clarity on requirement to repay excess Council Tax Support and proposal to disregard Severe Disability Premium transitional payments.

Directorate: Corporate Resources

Service: Finance

Name and job title of person doing the assessment

Name: Samantha Wills

Job Title: Income & Assessment Manager

Date of initial assessment: 15th October 2019

Scope your proposal

What is the aim of your policy or new service?

In 2013/14 the government abolished council tax benefit and local authorities were required to introduce local schemes. Overall funding was cut and there was a proviso that pensioners would be protected and made no worse off.

The local scheme we introduced was designed to cost the Council the same as when we received Revenue Support Grant which meant requiring a contribution of 15% from residents assessed as eligible for support. We increased the minimum contribution to 20% for the 2016 /17 year and restricted the support to a Band D to continue to offset the reduction of grant funding. A further increase to the minimum contribution to 25% was introduced in 17/18 and decreased Capital limits.

However with continued budget pressures, and having to find further income streams to fund our budget position, we increased the minimum contribution to 35% for the 2018/19 year and decreased the Capital limits further. It is still however our intention is to ensure the Local Council Tax Support scheme continues to provide support to low income households in Reading, whilst managing the decrease in funding.

The aims of this policy are:

- to manage the cost of the scheme within the available funds, ensuring that additional burdens are not put upon the general fund at further cost to local taxpayers;
- to maintain a scheme that meets the requirements of the Local Government Finance Act, the Equality Act 2010, the Child Poverty Act 2010, and the Housing Act 1996
- to ensure that the scheme is clear and easy to understand for applicants and to simplify administration where possible.

We are proposing that the application and calculation process used by the existing council tax support scheme will remain much the same but there will be some changes as follows:

- Removal of requirement to reclaim Council Tax Support following migration to Universal Credit
- Clarify requirement to repay excess Council Tax Support
- Disregard Severe Disability Premium transitional payments

Currently we have 7,932 customers receiving Council Tax Support, 4,507 are working age and 3,425 pension age.

As our Council Tax Support scheme continues to follow the calculation routes originally designed in the Council Tax Benefit Scheme, our scheme is still based on the award of premiums and applicable amounts that reflect disability and age.

Therefore it continues to protect those of pensioner age and those in receipt of disability benefits by offsetting by way of a means test in the main.

We will continue to use the discretionary Council Tax Support fund as part of our local council tax support scheme to help people who may face exceptional and extraordinary difficulties in paying their council tax.

Who will benefit from this proposal and how?

The Council faces significant challenges over the next few years, as it continues to receive reductions in grant funding, and increasing demands on service delivery.

This proposal forms part of the ongoing work that is being undertaken to address the Council's budget position and improve efficiency.

Everyone who currently receives Council Tax Support, except pensioners, will be affected in a positive way by these changes. They will not have to re-apply for Council Tax Support, payment of Severe Disability Transitional Payments will not adversely affect their claim and there will be no requirement to claim discretionary Council Tax Support where we have deemed the excess Council Tax Support 'official error' and the customer could not have reasonably known they were being overpaid.

What outcomes will the change achieve and for whom?

There will be a reduction in administration processes for both customer and staff when migrating to UC. It will reduce the risk of customers falling into arrears and suffering financial hardship

Who are the main stakeholders and what do they want?

73,000 Council Tax payers including 7,932 in receipt of Council Tax
Support Preceptors
Neighbouring Councils
Special interest organisations such as Citizens Advice Bureau, Welfare Rights, Housing Associations, National Federation of Landlords
Organisations representing vulnerable groups
Disabled people
Low income out of work
Low income in work
Homelessness prevention.

Consultation

| Relevant groups/experts | How were/will the views of these groups be obtained | Date when contacted |
|--|--|------------------------|
| Members / Senior Officers | Series of meetings regarding efficiencies and service plan proposals | Commenced January 2019 |
| Consultation We will consult on our proposals through November and December 2019. Feedback will contribute to the Equality Impact Assessment which will be updated once we have received the feedback in early January 2020. | Web on line survey | Nov -December 2019 |
| Targeted invitation to participate in on line consultation: Preceptors Neighbouring Councils Special interest organisations such as Citizens Advice Bureau, Welfare Rights, Housing | Email including Web on line survey link | Nov -December 2019 |

| | | |
|--|--|--|
| Associations, National Federation of Landlords Organisations representing vulnerable groups Disabled people Low income out of work Low income in work Homelessness prevention. | | |
|--|--|--|

Collect and Assess your Data

Describe how this proposal could impact on Racial groups

Data regarding ethnicity is not available from the Council Tax Support Database

Is there a negative impact? No

Describe how this proposal could impact on Gender/transgender (cover pregnancy and maternity, marriage)

Specific data is not available on those protected characteristics for the Council Tax Support client base

Is there a negative impact? No

Describe how this proposal could impact on Disability

The number of working age customers currently in receipt Council Tax Support with disability premiums (disability, enhanced disability, severe disability, disabled child) continue to receive a level of protection as their benefit calculation continues to reflect an allowance for disability. If they are in receipt of qualifying benefits which the majority are; they do not attract a non-dependant deduction.

The proposal will look to also disregard the Severe Disability Premium transitional payments made by the DWP

Is there a negative impact? No

Describe how this proposal could impact on Sexual orientation (cover civil partnership)

Civil Partnership is reflected and recognised within the overall benefits system; therefore these customers are affected in the same way as all customers. There are no differences in the calculations.

Is there a negative impact? No

Describe how this proposal could impact on Age

Pensioners will be protected from any changes as they have been protected by the Government, they cannot be asked to contribute any additional amount therefore their Council Tax Support entitlement remains the same.

For households of working age where the customer is not on passported benefits which means they are working or in receipt of work related benefits, these customers are positively affected by the changes.

Is there a negative impact? No

Describe how this proposal could impact on Religious belief?

Specific data is not available on those protected characteristics for the Council Tax Support client base

Is there a negative impact? No

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you MUST assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

Tick which applies

1. **No negative impact identified** Go to sign off X

2. **Negative impact identified but there is a justifiable reason**

How will you monitor for adverse impact in the future?

Listen to customer feedback and comments / complaints as changes are proposed and or implemented

We will provide updates on known impacts as the changes are implemented through the officer welfare & poverty steering group

Signed (completing officer) Samantha Wills
(reviewed)

Date 15th Oct 2019

Signed (Lead Officer) Matt Davis

Date